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BY ELECTRONIC COMMENT FILING SYSTEM

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Report of PrimeCo Spectrum Holdings LLC on
Implementation of TTY Digital Compatibility for 911
Emergency Calling for Station WPQL237
CC Docket No. 94-102**

Dear Ms. Salas:

On behalf of PrimeCo Spectrum Holdings LLC ("PrimeCo Spectrum"), pursuant to CC Docket No. 94-102, Fourth Report and Order, we hereby submit its report on implementation of TTY digital compatibility for 911 emergency calling for Station WPQL237.¹

¹ On April 16, 2001, Chicago 20MHz, LLC ("Chicago 20MHz") requested an extension of the deadline to file quarterly reports on implementation of TTY digital compatibility until 45 days after control of Station WPQL237 was transferred to a third party from a divestiture trust. The transfer of control to PrimeCo Wireless Communications LLC ("PrimeCo Parent") was consummated on October 31, 2001. On that same day, Chicago 20 MHz assigned the license to its wholly owned subsidiary PrimeCo Spectrum. Therefore, this submission is timely filed.

Development Activities

(1) Network infrastructure software development

PrimeCo Spectrum currently uses Lucent Technologies (“Lucent”) as the infrastructure provider for PrimeCo Spectrum’s CDMA system. PrimeCo Spectrum’s system has the latest wireless switch software release that is generally available (ECP 17.0, 5ESS 15.0). Lucent has developed the software feature required for TTY digital compatibility.

(2) Handset development and testing plans

Nokia is the only manufacturer that provides handsets with TTY digital compatibility. PrimeCo Spectrum is in the process of searching for a TTY relay set to use with the Nokia handset.

(3) Beta testing and lab testing

The manufacturers are responsible for beta testing and lab testing.

(4) Release and general availability to carriers of network infrastructure software

Lucent now provides the software feature required for TTY digital compatibility.

(5) Availability to carriers of full acceptance test units

As soon as PrimeCo Spectrum can obtain a TTY relay set to use with the Nokia handset, it will be able to test its system for TTY digital compatibility.

(6) Efforts toward achieving digital wireless solution compatibility with enhanced TTY devices

PrimeCo Spectrum intends to install the Lucent software feature for TTY digital compatibility and upgrade all network hardware to handle the implementation of the software feature as of December 31, 2001.

Testing and Deployment Activities

(7) Carrier coordination of testing with PSAP

As soon as PrimeCo Spectrum can obtain a TTY relay set to use with the Nokia handset, it will be able to coordinate testing with the various PSAPs. It is PrimeCo Spectrum’s intention to be able to coordinate and complete testing with all PSAPs prior to the June 30, 2002 deadline.

(8) Carrier testing activities, including field testing, consumer end-to-end testing and other necessary tests

As soon as PrimeCo Spectrum can obtain a TTY relay set to use with the Nokia handset, it will be able to test its system for TTY digital compatibility. It is PrimeCo Spectrum's intention to be able to complete testing prior to the June 30, 2002 deadline.

(9) Retail availability of necessary consumer equipment

As soon as PrimeCo Spectrum can obtain a TTY relay set to use with the Nokia handset, it will be able to provide consumer equipment for retail. It is PrimeCo Spectrum's intention to be able to do this prior to the June 30, 2002 deadline.

(10) Geographic scope of network infrastructure deployment

It is PrimeCo Spectrum's intention to deploy TTY digital compatibility throughout all parts of the Chicago, IL MTA (excluding the partitioned Wisconsin portion) where PrimeCo Spectrum is capable of providing service to customers.

Please address any inquiries regarding this matter to the undersigned.

Respectfully submitted,

/s/

Eliot J. Greenwald

Cc: Qualex International (by e-mail)
Pam Gregory (by e-mail)
Mindy Littell (by e-mail)
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